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August 23, 2016

Hon. Norman A. Mordue  
Senior U.S. District Court Judge  
Federal Building and U.S. Courthouse  
P.O. Box 7336  
Syracuse, New York 13261

**Re: U.S. v. Andrew Raymond and Brian Requena**  
**Docket No.: 5:15-CR-081-NAM**

Dear Judge Mordue:

This letter is written on behalf of myself as counsel for defendant, Andrew Raymond, and attorney, Mark McBride, on behalf of defendant, Brian Requena.

As set forth in AUSA Carla Freedman's letter to the Court yesterday, the defense joins in the government's request that the trial in this matter be adjourned until such time that the Second Circuit decides the important issues raised in the Zhang appeal.

Thank you for your consideration of this matter.

Respectfully submitted,

MARKS & BROOKLIER, LLP

By:



ANTHONY P. BROOKLLIER  
Attorney for Defendant  
ANDREW RAYMOND